

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Samantha M Gregory	Chapter 13 Proceeding
Debtor(s) PENNYMAC LOAN SERVICES, LLC Movant	24-13129-amc
vs. Samantha M Gregory	Hearing: 11/05/2024 at 10:00 am
and KENNETH E. WEST Respondents	

**OBJECTION TO CONFIRMATION OF THE PLAN**

PENNYMAC LOAN SERVICES, LLC (Movant), a secured creditor in this case objects to the confirmation of the Debtor's Chapter 13 plan and states the following:

1. The plan does not provide for the secured creditor, PENNYMAC LOAN SERVICES, LLC to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on September 5, 2024, Movant is the holder of a secured claim in the approximate amount of \$188,947.14 secured by the Debtor's property located at 19 Jester Lane, Levittown PA 19055.
3. The plan materially underestimates the pre-petition arrears claim of Movant, which is due arrears in the approximate amount of **\$42,710.49**. A proof of claim will be filed prior to the deadline for filing claims.
4. Debtor's Plan proposes to pay Movant **\$35,000.00** in pre-petition arrears, which is insufficient to provide for Movant's arrearage claim. See **Exhibit "A"** attached hereto and made a part hereof.
5. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Karina Velter, Esquire

POWERS KIRN, LLC

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Attorney for Movant

Dated: 10/08/2024